

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
1:17 CR 460-01**

UNITED STATES OF AMERICA

v.

PAULA K. BULLOCK

**Defendant's Motion to Extend
Time to Report for Active
Sentence**

COMES NOW Paula K. Bullock, Defendant in the above-captioned case, and requests an extension of the current deadline for her to report to federal authorities to begin serving the active portion of her sentence. In support of this request, Ms. Bullock states the following:

- 1) On August 1st, 2019, pursuant to her plea of guilty to one count of 18 U.S.C. § 1029(a)(2) (unauthorized use of an access device) and one count of 18 U.S.C. § 1001(a)(3) (false statement), Ms. Bullock was sentenced to a four (4) month period of active incarceration.
- 2) At that time, the Court ordered Ms. Bullock to voluntarily surrender to federal marshals in Greensboro, North Carolina on September 16th, 2019.

- 3) As of this filing, the Bureau of Prisons has not received the administrative files necessary to designate a facility at which Ms. Bullock will serve her sentence.
- 4) Absent such designation, it is unclear where Ms. Bullock will be incarcerated and it is likely that the government will incur higher expenses due to any such incarceration.
- 5) In addition, there is a substantial possibility that such incarceration will not meet the care and treatment standards of the Bureau of Prisons.
- 6) Ms. Bullock has been on unsupervised release for nearly two years pending final disposition of the charges against her.
- 7) Ms. Bullock has appeared at all court hearings.
- 8) Ms. Bullock is not a flight risk. She has substantial family ties, including custody of her son.

WHEREFORE, Ms. Bullock requests that:

1) That the Court delay Ms. Bullock's report date for thirty (30) days, until October 16th, 2019, in order to allow the Bureau of Prisons to designate a facility for her active sentence.

This is the 5th day of September, 2019.

Respectfully submitted,

//Paul M. Dubbeling//

Paul M. Dubbeling
210 North Columbia Street
Chapel Hill, North Carolina 27514
(919) 260-1615 (office)
paul.dubbeling@gmail.com
N.C. Bar #: 47014

Certificate of Service

This is to certify that the undersigned has this date electronically filed the foregoing **Defendant's Motion to Extend Time to Report for Active Sentence** with the Clerk of Court using the Court's CM/ECF System, which will send notice to the following:

Frank Joseph Chut, Jr.
U.S. Attorney's Office
101 South Edgeworth Street, 4th Floor
Greensboro, NC 27401
336-332-6320
frank.chut@usdoj.gov

Kelley P. Kennedy Gates
U.S. Attorney's Office
101 South Edgeworth Street, 4th Floor
Greensboro, NC 27401
336-332-6317
kennedy.gates@usdoj.gov

This is the 5th day of September, 2019.

/s/ Paul M. Dubbeling
Paul M. Dubbeling
210 North Columbia Street
Chapel Hill, NC 27514
(919) 260-1615 Telephone
(919) 404-7074 Facsimile
paul.dubbeling@gmail.com
NC Bar # 47014